

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

WILLIAM C. BOND

*

Plaintiff

*

v.

* Civil Court Action No: MJG-01-CV2600

KENNETH BLUM, SR., ET AL.

*

Defendant

*

* * * * *

**DECLARATION UNDER PENALTY OF PERJURY OF
WILLIAM FITTS RYAN, JR. ESQUIRE**

WILLIAM FITTS RYAN, JR., under penalty of perjury and upon personal knowledge, declares as follows:

1. My name is William Fitts Ryan, Jr.
2. I am over eighteen (18) years of age.
3. I am competent to testify to the matters set forth herein.
4. I testify to matters set forth herein from my own personal knowledge.
5. I am a partner at the law firm of Whiteford, Taylor & Preston, LLP, 7 Saint Paul Street, Baltimore, Maryland 21202 (hereinafter referred to as "Whiteford").
6. Attached hereto as **Exhibit A-1** is a photocopy of the entry for me in the 2002 edition of MARTINDALE HUBBELL LAW DIRECTORY. That entry was correct when published and has not changed in any material way.
7. Since 1979, I have practiced almost exclusively in the area of litigation, focusing on appellate practice, business litigation, intellectual property litigation,

professional liability litigation, securities litigation, environmental litigation and other complex civil matters.

8. I have practiced in the United States Court of Appeals for the Fourth Circuit, the United States District Court for the District of Maryland, and numerous other federal and state courts throughout the United States.

9. In February 2002, Whiteford was engaged to represent McDaniel, Bennett & Griffin's interest in the appeal of this matter.

10. Attached to this Memorandum as **Exhibits B-1** and **B-2** are the invoices of Whiteford for the professional time and expenses our firm devoted to the defense and prosecution of this case on appeal. This invoice accurately shows the time I spent on this matter and accurately records expenses that were incurred in this matter through March 14, 2003.

11. My standard hourly rate for 2002 was \$325.00 per hour. This was my usual hourly rate charged to other clients of our firm during that time. My current hourly rate for 2003 is \$350.00 per hour.

12. However, my hourly rate for this engagement was and continues to be \$175.00.

13. The attached invoice also reflects time incurred for Amy E. Askew, an associate at Whiteford. This invoice accurately reflects the time devoted by Ms. Askew to this matter through March 14, 2003.

14. The attached invoice charges Ms. Askew's time at \$145.00 per hour. Ms. Askew's standard billing rate for 2002 was \$175.00 per hour and is currently \$185.00 per hour.

15. The attached invoice reflects the fact that, in several aspects of the appeal of this case, my firm and I took a principal role. For example, I was designated lead counsel for the appeal, my associate and I were responsible for drafting a substantial portion of the appellate briefs, and I was responsible for presenting to the Fourth Circuit the arguments advanced by Defendants in response to Plaintiff's appeal of this Court's Summary Judgment ruling.

16. Based on my familiarity with the market for legal services in Baltimore, I believe that the hourly rates charged by our firm for this particular engagement were eminently reasonable and indeed less than the rates customarily charged by attorneys of our backgrounds handling federal litigation.

THIS ENDS MY DECLARATION

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on _____.

_____/s/
William Fitts Ryan, Jr.

28 U.S.C. §1746

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